

PETER C. BROWN, ESQ.  
Nevada State Bar No. 5887  
TY M. MAYNARICH, ESQ.  
Nevada State Bar No. 14584  
BREMER WHYTE BROWN & O'MEARA LLP  
1160 N. TOWN CENTER DRIVE  
SUITE 250  
LAS VEGAS, NV 89144  
TELEPHONE: (702) 258-6665  
FACSIMILE: (702) 258-6662  
pbrown@bremerwhyte.com  
tmaynarich@bremerwhyte.com

Attorneys for Defendant,  
David Joseph Robinson

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

FABIAN JESUS BROOKS ARIAS,  
Plaintiff,  
vs.  
DAVID JOSEPH ROBINSON, an  
individual; DOES I through XV, and ROE  
Corporations I through X, inclusive,,  
Defendant.

Case No. 2:21-cv-00644-GMN-DJA

**STIPULATION AND ORDER  
REGARDING THE DEPOSITION  
OF DR. DEXTER**

Plaintiff, FABIAN JESUS BROOKS ARIAS, and Defendant, DAVID JOSEPH ROBINSON (collectively, the "Parties") by and through their respective counsel, hereby submit this Stipulation and Order Regarding the Deposition of Dr. Dexter (hereinafter, "Stipulation and Order"), pursuant to LR 26-6 and LR IA 1-3(f).

This Stipulation and Order shall not affect the Dispositive Motion Deadline presently set for April 8, 2022. (*See*, Joint Discovery Plan and Proposed Scheduling Order, ECF 14), on file and referenced herein). Further, this Stipulation and Order shall not affect the Pretrial Order deadline of May 8, 2022. (*See Id.*).

The Parties met and conferred in good faith pursuant to LR IA 1-3(f) and agreed to the following Stipulation and Order with respect to the deposition of Dr. Dexter

1 which will exceed the ten (10) depositions provided for by FRCP (a)(2)(A)(i). As  
2 previously stipulated, due to scheduling conflicts, the unavailability of treating  
3 physician/expert witnesses, and the depositions of out-of-state witnesses, this  
4 Stipulation and Order is necessary to allow for Dr. Dexter's testimony outside the close  
5 of discovery.

6 Furthermore, Plaintiff originally disclosed Dr. Roger Moore as the treating  
7 provider from Spinal Rehabilitation Center, but Dr. Moore is no longer a clinician at  
8 that provider. Accordingly, Dr. Dexter was another treating chiropractor and was  
9 substituted as a witness in his place on behalf of that provider. As such, the Parties  
10 have agreed to allow the following eleventh (11<sup>th</sup>) deposition of Dr. Dexter to proceed  
11 outside the close of discovery and prior to the Dispositive Motion Deadline of April 8,  
12 2022. **There are no further anticipated stipulations related to depositions in this**  
13 **matter.**

14 The stipulated deposition is scheduled to proceed as follows:

15 1. Dr. Roger Dexter, D.C., on March 29, 2022 at 1:30 p.m.

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1220.363 4877-9995-6242.2

**From:** [Betsy Jefferis](#)  
**To:** [Ty M. Maynarich](#); [Real Jumao-as](#)  
**Cc:** [Michelle Dowling](#); [Bradley Williams](#); [Peter Brown](#)  
**Subject:** RE: 2:21-cv-00644-GMN-DJA - Arias v. Robinson - DOI 10/17/2019 - BWBO 1220.363 - SAO Dexter  
**Date:** Thursday, March 03, 2022 10:47:17 AM

---

\*\*\* This is an external email \*\*\*

---

Approved. Thanks,



**BETSY C. JEFFERIS, ESQ.**

*Litigation Attorney*  
*Gina Corena & Associates*  
300 S. 4th Street, Suite 1250  
Las Vegas, NV 89101  
T: (702) 680-1111  
F: (888) 897-6507  
[betsy@lawofficcorena.com](mailto:betsy@lawofficcorena.com)

NOTICE: This E-mail (including attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521. The information herein is confidential, privileged and exempt from disclosure under applicable law. This E-mail (including attachments) are intended solely for the use of the addressee hereof. If you are not the intended recipient of this message, you are prohibited from reading, disclosing, reproducing, distributing, disseminating, or otherwise using this transmission. The originator of this e-mail and its affiliates do not represent, warrant or guarantee that the integrity of this communication has been maintained or that this communication is free of errors, viruses or other defects. Delivery of this message or any portions herein to any person other than the intended recipient is not intended to waive any right or privilege. If you have received this message in error, please promptly notify the sender by e-mail and immediately delete this message from your system.

---

**From:** Ty M. Maynarich <[tmaynarich@bremerwhyte.com](mailto:tmaynarich@bremerwhyte.com)>  
**Sent:** Thursday, March 3, 2022 10:43 AM  
**To:** Betsy Jefferis <[Betsy@lawofficcorena.com](mailto:Betsy@lawofficcorena.com)>; Real Jumao-as <[RealJ@lawofficcorena.com](mailto:RealJ@lawofficcorena.com)>  
**Cc:** Michelle Dowling <[mdowling@bremerwhyte.com](mailto:mdowling@bremerwhyte.com)>; Bradley Williams <[bawilliams@bremerwhyte.com](mailto:bawilliams@bremerwhyte.com)>; Peter Brown <[pbrown@bremerwhyte.com](mailto:pbrown@bremerwhyte.com)>  
**Subject:** FW: 2:21-cv-00644-GMN-DJA - Arias v. Robinson - DOI 10/17/2019 - BWBO 1220.363 - SAO Dexter

Betsy,

Please find enclosed our SAO regarding Dr. Dexter's deposition which will be the 11<sup>th</sup> on behalf of Defendant in this matter. Let me know if you would like any further changes and please provide your authorization to affix your electronic signature.

Thank you,  
Ty Maynarich

**Ty M. Maynarich**  
[Bremer Whyte Brown & O'Meara, LLP](#) | Las Vegas, NV  
d: 725-210-8829  
t: 702.258.6665